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&
HOSTETLER LL **DOCKET FILE COPY ORIGINAL**
COUNSELLORS AT LAW

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RECEIVED

January 4, 2001

JAN - 4 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

VIA MESSENGER

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

**Re: AMENDMENT TO PETITION FOR RULEMAKING TO AMEND
THE DTV TABLE OF ALLOTMENTS**

Dear Ms. Salas:

On behalf of Channel 6, Inc. ("KCEN"), licensee of television station KCEN-TV, Temple, Texas, I am transmitting herewith an original and four (4) copies of an Amendment to Petition for Rulemaking to Amend the DTV Table of Allotments ("Amendment"). KCEN's original Petition was filed on September 29, 2000. Because the Commission staff recently determined that the proposed KCEN-TV digital facility would cause an interference issue to arise with respect to Station KTRE(TV), Lufkin, Texas, a new engineering exhibit is being submitted to eliminate the interference. Accordingly and specifically, by the filing of this Amendment, KCEN petitions the Commission to allot Channel 9 as the DTV channel for KCEN-TV, in place of the current allotment of Channel 50. Station KCEN-TV currently broadcasts on Channel 6.

Should there be any questions please do not hesitate to contact the undersigned.

Sincerely,



Kenneth C. Howard, Jr.

cc: Pam Blumenthal, Federal Communications Commission
Nazifa Naim, Federal Communications Commission
KCEN-TV Public Inspection File

No. of Copies rec'd
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2. As documented by the attached engineering study, KCEN's proposed channel change, as amended, is in compliance with the Commission's rules and is specifically permissible under Section 73.623(c)(2), 47 C.F.R. § 73.623(c)(2). See Technical Exhibit prepared by Jerome J. Manarchuck of du Treil, Lundin & Rackley, Inc., attached as Exhibit A.

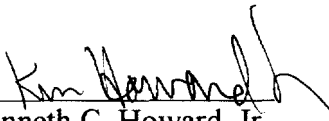
3. As described in KCEN's original Petition, the requested channel change would serve the public interest because it permits comparable coverage of Station KCEN-DT's service area at a far lower cost. Utilizing VHF Channel 9 instead of UHF Channel 50 will dramatically reduce both the construction and operating costs for the station. Utilizing VHF facilities will result in the station saving hundreds of thousands of dollars in construction costs and will reduce electricity costs for the station by at least \$14,000 per month. These substantial savings are important to KCEN's ability to maintain a high level of public interest programming. Like other broadcasters operating on the fringes of large markets, KCEN confronts the difficult economic reality that competition for its viewers' attention is increasing dramatically faster than its opportunities for enhancing station revenues. Taking advantage of these substantial potential economies is important to the continuation of Station KCEN's high level of public service.

5. Further, viewer identification of a VHF Channel 9 operation will be augmented by the fact that KCEN's analog and digital operations would be in the same frequency band.

6. Accordingly, KCEN requests that the Commission amend the DTV Table of Allotments to allot Channel 9 to KCEN-DT, Temple, Texas.

Respectfully submitted,

CHANNEL 6, INC.

By: 
Kenneth C. Howard, Jr.
Counsel

Baker & Hostetler LLP
Suite 1100
1050 Connecticut Ave., N.W.
Washington, D.C. 20036-5304
Telephone: (202) 861-1580

January 4, 2001

EXHIBIT A

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
AN AMENDMENT TO A PENDING
PETITION FOR RULE MAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION KCEN-TV
TEMPLE, TEXAS

Technical Summary

This technical narrative and associated exhibits have been prepared on behalf of KCEN-TV at Temple, Texas in order to amend it's pending Petition for Rule Making which proposed to modify the DTV allotment of KCEN-TV from UHF channel 50 to VHF channel 9.

The amendment proposes to modify the facilities specified in the KCEN-TV petition for rulemaking (BPRM-20000229ABS) by proposing a directional antenna operation. A directional facility has been proposed to eliminate an interference issue with station KTRE(TV), on Ch. 9 at Lufkin, Texas. No other changes are proposed.

DTV channel 9 can be substituted and allotted to Temple, Texas in compliance with the principle community coverage requirements of Section 73.625(a) at reference coordinates Latitude 31°16'24", Longitude 97°13'14".¹ In addition, operation on DTV channel 9 appears possible with a maximum directional effective radiated power (ERP) of up to 7.5 kW utilizing an Andrew ATW8V3-HSWC-9 "cardioid" type directional antenna. An antenna height above average terrain (HAAT) of 573 meters is also proposed. The proposed channel change is acceptable under the 2 percent criterion for *de minimis* impact applicable to DTV allotment modifications under Section 73.623(c)(2). Therefore, it is proposed to modify

¹ This is also the current DTV allotment reference point as well as the existing NTSC transmitter site for KCEN-TV.

KCEN-TV's authorization to specify operation on the alternate DTV channel with the following specifications:

State & City	DTV Channel	DTV ERP (kW)	Antenna HAAT (m)
TX, Temple	9	7.5 (MAX-DA)	573

It is also proposed to amend the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules, as follows:

<u>City</u>	<u>Present</u>	<u>Channel No.</u>	<u>Proposed</u>
Temple, Texas	50		9

Station KCEN-TV is currently allotted UHF channel 50 for its DTV operation with an ERP of 1000 kW and an HAAT of 573 meters. In addition, KCEN-TV has a construction permit for DTV operation on channel 50 which specifies a nondirectional antenna maximum ERP of 1000 kW and an HAAT of 527 meters (BPCDT-20000223AAQ).

Station KCEN-TV proposes to allot VHF channel 9 at Latitude 31°16'24", Longitude 97°13'14". It is proposed to operate with an antenna radiation center height above mean sea level (RCMSL) of 756 meters, an HAAT of 573 meters and a directional antenna maximum ERP of 7.5 kW.

Figure 1 provides the horizontal and vertical plane radiation patterns for the proposed Andrew ATW8V3-HSWC-9, horizontally polarized, directional antenna system.

Figure 2 is a separation study for DTV channel 9 toward other NTSC and DTV allotments based on a 161 kilometer "buffer". Although the separation requirements are only applicable to new DTV allotments, they can be used as an indication of which stations have the potential of receiving interference from the proposed channel 9 DTV operation.

Figure 3 provides a summary of interference and service for the proposed channel 9 allotment. Determination of interference and service was based on the procedures outlined in OET Bulletin No. 69 and criteria contained in Sections 73.622 and 73.623 of the FCC's rules.² It is believed that the proposed channel 9 operation is in full compliance with the FCC's 2%/10% interference criteria. In accordance with the FCC Public Notice released August 10, 1998 and entitled "Additional Application Processing Guidelines for Digital Television (DTV)", it is respectfully requested that the Commission review the proposal using a 1 kilometer cell size.

Figure 4 is a map which depicts the 36 dBu, F(50,90) noise limited contour for the proposed channel 9 DTV operation. Also shown are the city limits of Temple based on 1990 Census data. As indicated, all of Temple is located within the 36 dBu contour as currently required by FCC rules. Therefore, the proposed channel 9 DTV allotment will comply with the city coverage requirements contained in Section 73.625(a).

The FCC has proposed to modify the city coverage requirement from the 36 dBu, F(50,90) contour to the 57 dBu, F(50, 90) contour in MM Docket No. 00-39 (Review of the Commission's Rules and Policies Affecting the Conversion of Digital Television). The 57 dBu, F(50,90) contour for the proposed channel 9 DTV operation is depicted on Figure 4 and, as shown, all of Temple is located within the 57 dBu contour. Therefore, the proposed channel 9 DTV allotment will comply with the FCC's proposed city coverage requirements contained in MM Docket No. 00-39.

² The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. **A nominal grid size resolution of 1 km was employed.** An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

Studies indicate that the proposed channel 9 operation will not adversely impact any LPTV stations which filed for Class A eligibility.

As the community of Temple, Texas is located 415.6 kilometers from the closest point of the U.S.-Mexican border, coordination of the proposal with Mexico is not believed necessary.

Conclusion

VHF channel 9 can be substituted for the current UHF DTV channel 50 allotment of KCEN-TV in compliance with the FCC's rules concerning DTV allotment changes.


Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
(941) 329-6000

January 3, 2001



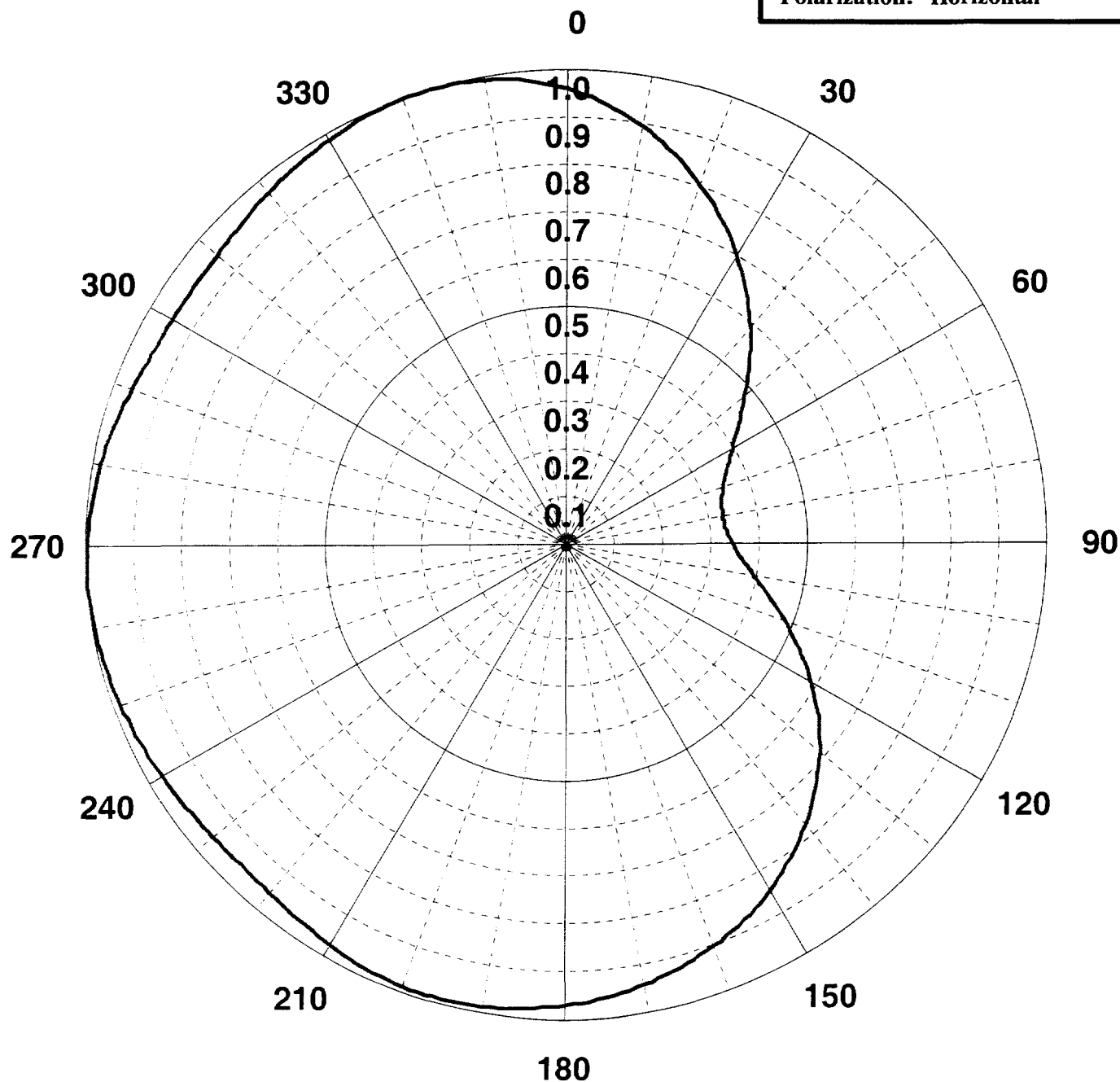
ANDREW

Channel: 9

Type: ATW-WC

Gain: 1.5 (1.76 dB)

Polarization: Horizontal



ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

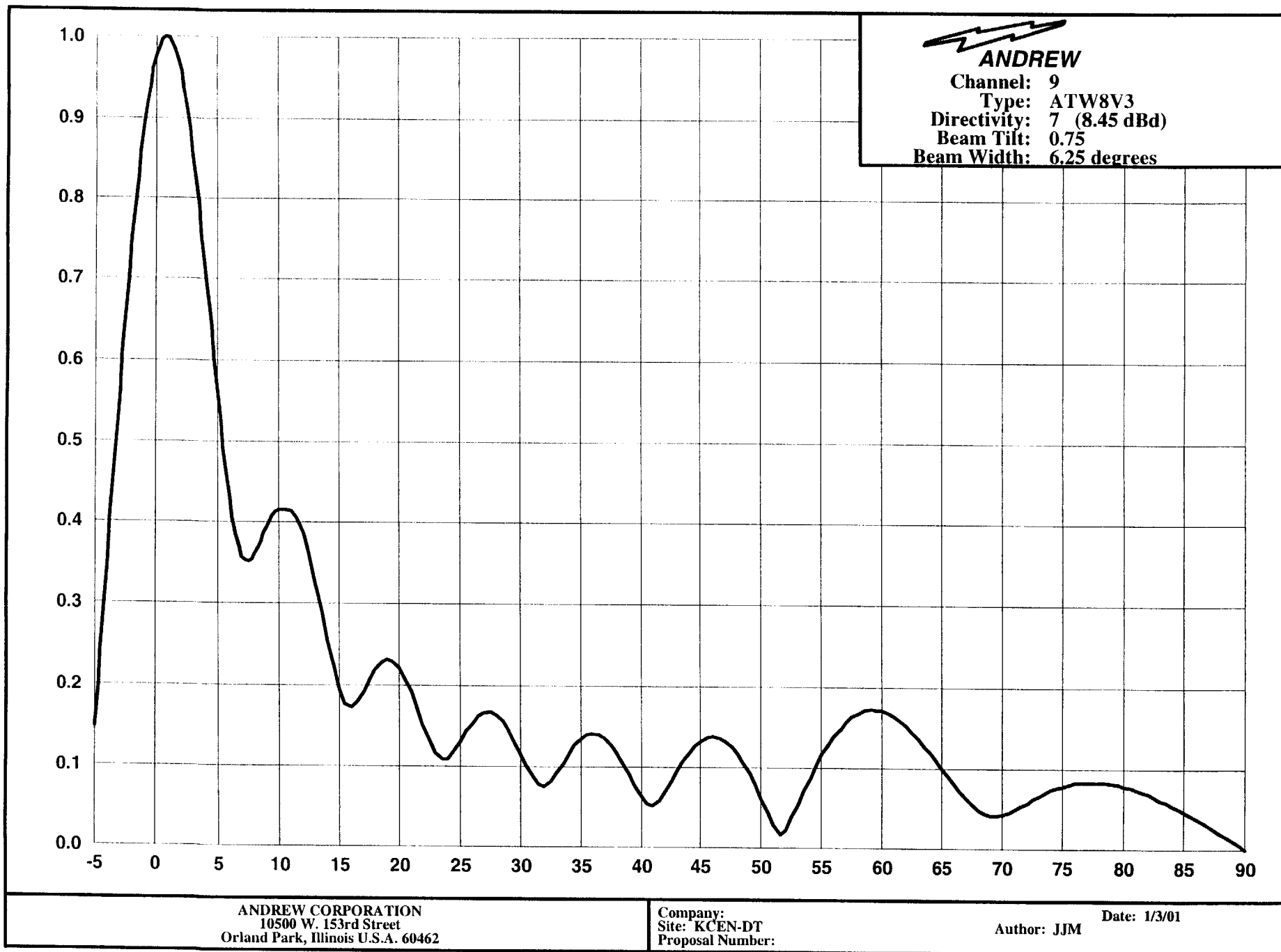
Company:
Site:
Proposal Number:

Date: 1/3/01
Author:

TECHNICAL EXHIBIT
AMENDMENT TO A
PETITION FOR RULE MAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION KCEN-TV
TEMPLE, TEXAS
CH 9 7.5 KW (MAX-DA) 573 M

Tabulation of Directional Antenna Pattern

<u>Azimuth</u> <u>(deg. true)</u>	<u>Relative</u> <u>Field</u>	<u>Effective</u> <u>Radiated Power(kW)</u>	<u>Azimuth</u> <u>(deg true)</u>	<u>Relative</u> <u>Field</u>	<u>Effective</u> <u>Radiated Power(kW)</u>
0	0.959	6.90	180	0.970	7.06
10	0.893	5.98	190	0.987	7.31
20	0.803	4.84	200	0.989	7.34
30	0.700	3.68	210	0.973	7.10
40	0.589	2.60	220	0.957	6.87
50	0.480	1.73	230	0.957	6.87
60	0.395	1.17	240	0.970	7.06
70	0.345	0.89	250	0.986	7.29
80	0.328	0.81	260	0.996	7.44
90	0.343	0.88	270	0.997	7.46
100	0.394	1.16	280	0.984	7.26
110	0.481	1.74	290	0.962	6.94
120	0.585	2.57	300	0.947	6.73
130	0.686	3.53	310	0.950	6.77
140	0.773	4.48	320	0.968	7.03
150	0.846	5.37	330	0.987	7.31
160	0.902	6.10	340	1.000	7.50
170	0.942	6.66	350	0.993	7.40





Angle	Amp	dB	Angle	Amp	dB	Angle	Amp	dB	Angle	Amp	dB
-5.00	0.147	-16.65	9.00	0.394	-8.09	36.00	0.141	-17.02	63.50	0.127	-17.92
-4.75	0.197	-14.11	9.25	0.402	-7.92	36.50	0.139	-17.14	64.00	0.118	-18.56
-4.50	0.248	-12.11	9.50	0.408	-7.79	37.00	0.135	-17.39	64.50	0.109	-19.25
-4.25	0.300	-10.46	9.75	0.413	-7.68	37.50	0.127	-17.92	65.00	0.099	-20.09
-4.00	0.353	-9.04	10.00	0.415	-7.64	38.00	0.116	-18.71	65.50	0.089	-21.01
-3.75	0.405	-7.85	10.50	0.415	-7.64	38.50	0.104	-19.66	66.00	0.080	-21.94
-3.50	0.458	-6.78	11.00	0.414	-7.66	39.00	0.090	-20.92	66.50	0.071	-22.97
-3.25	0.509	-5.87	11.50	0.405	-7.85	39.50	0.076	-22.38	67.00	0.062	-24.15
-3.00	0.560	-5.04	12.00	0.386	-8.27	40.00	0.063	-24.01	67.50	0.055	-25.19
-2.75	0.609	-4.31	12.50	0.360	-8.87	40.50	0.054	-25.35	68.00	0.048	-26.38
-2.50	0.657	-3.65	13.00	0.329	-9.66	41.00	0.052	-25.68	68.50	0.044	-27.13
-2.25	0.702	-3.07	13.50	0.293	-10.66	41.50	0.058	-24.73	69.00	0.041	-27.74
-2.00	0.745	-2.56	14.00	0.257	-11.80	42.00	0.068	-23.35	69.50	0.041	-27.74
-1.75	0.786	-2.09	14.50	0.223	-13.03	42.50	0.082	-21.72	70.00	0.042	-27.54
-1.50	0.824	-1.68	15.00	0.195	-14.20	43.00	0.095	-20.45	70.50	0.045	-26.94
-1.25	0.858	-1.33	15.50	0.177	-15.04	43.50	0.107	-19.41	71.00	0.049	-26.20
-1.00	0.889	-1.02	16.00	0.173	-15.24	44.00	0.118	-18.56	71.50	0.053	-25.51
-0.75	0.917	-0.75	16.50	0.179	-14.94	44.50	0.127	-17.92	72.00	0.057	-24.88
-0.50	0.941	-0.53	17.00	0.192	-14.33	45.00	0.133	-17.52	72.50	0.062	-24.15
-0.25	0.961	-0.35	17.50	0.207	-13.68	45.50	0.137	-17.27	73.00	0.066	-23.61
0.00	0.977	-0.20	18.00	0.220	-13.15	46.00	0.138	-17.20	73.50	0.070	-23.10
0.25	0.989	-0.10	18.50	0.229	-12.80	46.50	0.136	-17.33	74.00	0.073	-22.73
0.50	0.996	-0.03	19.00	0.232	-12.69	47.00	0.132	-17.59	74.50	0.076	-22.38
0.75	1.000	0.00	19.50	0.230	-12.77	47.50	0.125	-18.06	75.00	0.078	-22.16
1.00	0.999	-0.01	20.00	0.222	-13.07	48.00	0.116	-18.71	75.50	0.080	-21.94
1.25	0.995	-0.04	20.50	0.209	-13.60	48.50	0.105	-19.58	76.00	0.082	-21.72
1.50	0.986	-0.12	21.00	0.192	-14.33	49.00	0.091	-20.82	76.50	0.083	-21.62
1.75	0.973	-0.24	21.50	0.172	-15.29	49.50	0.077	-22.27	77.00	0.083	-21.62
2.00	0.957	-0.38	22.00	0.151	-16.42	50.00	0.061	-24.29	77.50	0.083	-21.62
2.25	0.937	-0.57	22.50	0.131	-17.65	50.50	0.044	-27.13	78.00	0.083	-21.62
2.50	0.914	-0.78	23.00	0.116	-18.71	51.00	0.028	-31.06	78.50	0.083	-21.62
2.75	0.887	-1.04	23.50	0.108	-19.33	51.50	0.017	-35.39	79.00	0.081	-21.83
3.00	0.858	-1.33	24.00	0.109	-19.25	52.00	0.022	-33.15	79.50	0.080	-21.94
3.25	0.826	-1.66	24.50	0.117	-18.64	52.50	0.037	-28.64	80.00	0.078	-22.16
3.50	0.792	-2.03	25.00	0.130	-17.72	53.00	0.054	-25.35	80.50	0.076	-22.38
3.75	0.756	-2.43	25.50	0.143	-16.89	53.50	0.071	-22.97	81.00	0.074	-22.62
4.00	0.718	-2.88	26.00	0.154	-16.25	54.00	0.087	-21.21	81.50	0.071	-22.97
4.25	0.680	-3.35	26.50	0.163	-15.76	54.50	0.102	-19.83	82.00	0.068	-23.35
4.50	0.641	-3.86	27.00	0.167	-15.55	55.00	0.116	-18.71	82.50	0.065	-23.74
4.75	0.602	-4.41	27.50	0.168	-15.49	55.50	0.129	-17.79	83.00	0.061	-24.29
5.00	0.564	-4.97	28.00	0.164	-15.70	56.00	0.140	-17.08	83.50	0.058	-24.73
5.25	0.527	-5.56	28.50	0.156	-16.14	56.50	0.149	-16.54	84.00	0.054	-25.35
5.50	0.492	-6.16	29.00	0.145	-16.77	57.00	0.157	-16.08	84.50	0.050	-26.02
5.75	0.460	-6.74	29.50	0.131	-17.65	57.50	0.164	-15.70	85.00	0.046	-26.74
6.00	0.430	-7.33	30.00	0.115	-18.79	58.00	0.168	-15.49	85.50	0.042	-27.54
6.25	0.405	-7.85	30.50	0.100	-20.00	58.50	0.171	-15.34	86.00	0.037	-28.64
6.50	0.385	-8.29	31.00	0.086	-21.31	59.00	0.173	-15.24	86.50	0.033	-29.63
6.75	0.369	-8.66	31.50	0.077	-22.27	59.50	0.172	-15.29	87.00	0.028	-31.06
7.00	0.358	-8.92	32.00	0.075	-22.50	60.00	0.171	-15.34	87.50	0.024	-32.40
7.25	0.353	-9.04	32.50	0.081	-21.83	60.50	0.168	-15.49	88.00	0.019	-34.42
7.50	0.352	-9.07	33.00	0.091	-20.82	61.00	0.164	-15.70	88.50	0.014	-37.08
7.75	0.355	-9.00	33.50	0.103	-19.74	61.50	0.158	-16.03	89.00	0.010	-40.00
8.00	0.360	-8.87	34.00	0.115	-18.79	62.00	0.152	-16.36	89.50	0.005	-46.02
8.25	0.368	-8.68	34.50	0.126	-17.99	62.50	0.144	-16.83	90.00	0.000	---
8.50	0.377	-8.47	35.00	0.134	-17.46	63.00	0.136	-17.33			
8.75	0.386	-8.27	35.50	0.139	-17.14	63.50	0.127	-17.92			

ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A. 60462

Company:
Site: KCEN-DT
Proposal Number:

Date: 1/3/01
Author: JJM

DTV - TV Separation Study

Job Title : Proposed DTV Ch. 9
Zone : 2
Channel 9 (186-192 MHz)

Separation Buffer 161 km
FCC TV DB Date : 01/02/01
Coordinates : 31-16-24 97-13-14

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
WFAA-T LIC	DALLAS TX BLCT	-19900615	8(o) II	316 512	32-35-06 96-58-41	8.9	147.25 22.25	11.0/125 CLEAR
KLRN APP	SAN ANTONIO TX BPRM	-20000414	8 III	8.3 263	29-19-38 98-21-17	207.0	241.76 116.76	11.0/125 CLEAR
KUHT LIC	HOUSTON TX BLET	-19830325	* 8(-) III	316 564	29-34-28 95-29-37	138.3	251.00 126.00	11.0/125 CLEAR
KLST LIC	SAN ANGELO TX BLCT	-19811028	8(+) II	316 442	31-22-01 100-02-48	273.0	269.22 144.22	11.0/125 CLEAR
KTRE LIC	LUFKIN TX BLCT	-19851025	9(o) III	158 204	31-25-09 94-48-02	85.3	230.86 -42.74	273.6 SHORT
KLRN LIC	SAN ANTONIO TX BLET	-19840417	* 9(-) III	302 283	29-19-33 98-21-25	207.0	242.00 -31.60	273.6 SHORT
KRBC-T LIC	ABILENE TX BLCT	-1577	9(+) II	316 259	32-17-13 99-44-20	296.0	263.70 -9.90	273.6 SHORT
KWTX-T LIC	WACO TX BLCT	-19790730	10(+) II	209 552	31-19-19 97-19-02	300.5	10.68 0.32	11.0/125 CLOSE

DTV - DTV Separation Study

Job Title : Proposed DTV Ch. 9
Zone : 2
Channel 9 (186-192 MHz)

Separation Buffer 161 km
FCC DTV DB Date: 01/02/01
Coordinates : 31-16-24 97-13-14

Call Status	City St	FCC File No.	Channel Zone	ERP(kW) HAAT(m)	Latitude Longitude	Bear. True	Dist. (km)	Req. (km)
KCEN-T APP	TEMPLE TX BPRM	-20000229	9 II	7.5 573	31-16-24 97-13-14	0.0	0.00	
WFAA-D LIC	DALLAS TX BLCDDT	-19981103	9 II	18.6 527	32-35-06 96-58-41	8.9	147.25 -126.35	273.6 SHORT
DWFAATV DTVALT TX	DALLAS TX		9 II	21.5 512	32-35-06 96-58-41	8.9	147.24 -126.36	273.6 SHORT
DKUHT DTVALT TX	HOUSTON TX		9 III	8.4 564	29-34-28 95-29-37	138.3	250.99 -22.61	273.6 SHORT
KUHT-D CP	HOUSTON TX BPEDT	-19990113	* 9 III	8.4 564	DA 29-34-28 95-29-37	138.3	251.00 -22.60	273.6 SHORT
KLTV APP	TYLER TX BMPCDDT	-20000501	10 II	15 302	32-32-23 95-13-12	52.8	235.65 110.65	11.0/125 CLEAR
KLTV-T APP	TYLER TX BPRM	-20000731	10 III	7 302	32-32-23 95-13-12	52.8	235.65 110.65	11.0/125 CLEAR

TECHNICAL EXHIBIT
AMENDMENT TO A
PETITION FOR RULE MAKING TO
MODIFY THE DTV ALLOTMENT TABLE
STATION KCEN-TV
TEMPLE, TEXAS

Interference and Service Summary

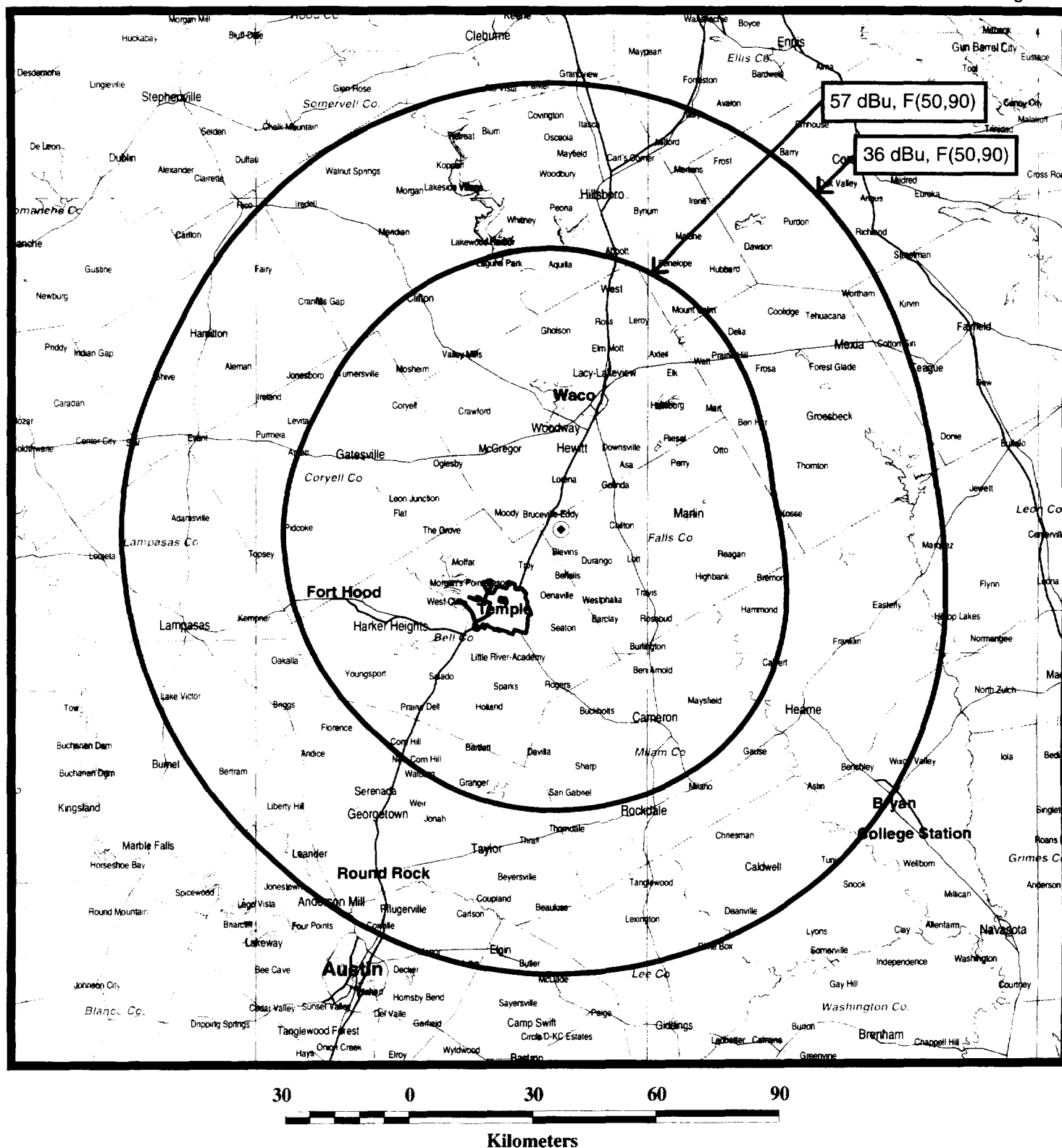
I. Interference Caused

Protected NTSC/DTV Station	FCC Service Population	Current Interference	Proposed Interference Population	Unique Interference Population*
WFAA-TV, NTSC Ch. 8 Dallas, TX	4,232,780	0.0%	8,700 (0.21%)	--
WFAA-DT, DTV Ch. 9 Dallas, TX				
Allotment	4,202,000	0.0%	76,510 (1.81%)	--
License (BLCDT-19981103KG)	4,202,000	--	73,460 (1.75%)	--
KTRE-TV, NTSC Ch. 9 Lufkin, TX	224,473	10.0%	485 (0.22%)	0 (0.0%)
KLRN-TV, NTSC Ch. 9 San Antonio, TX	1,524,417	0.3%	13,823 (0.91%)	--
KUHT-DT, DTV Ch. 9 Houston, TX				
Allotment	3,852,000	0.0%	5,459 (0.14%)	--
CP (BPEDT-19990113KF)	3,852,000	--	3,601 (0.09%)	--
KRBC-TV, NTSC Ch. 9 Abilene, TX	224,003	3.3%	880 (0.39%)	

*Considers interference "masking" from other NTSC and DTV assignments.

II. Service

	Population
Within Noise Limited Contour	830,129
Not Affected by Terrain Losses	821,038
Lost to NTSC Interference	33,679
Lost to DTV Interference	86,915
Total Service	700,444



PREDICTED COVERAGE CONTOURS

STATION KCEN-DT
 TEMPLE, TEXAS
 CH 9 7.5 KW (MAX-DA)

du Treil, Lundin & Rackley, Inc. Sarasota, FL